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**ADELPHIA COMMUNICATIONS**  
CORPORATION, aka Century Mendocino Cable  
TV dba Adelphia Cable Communications

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

SIFA TUIAKI and LUPE TUIAKI,

**Plaintiffs,**

V.

PACIFIC GAS & ELECTRIC COMPANY;  
PAULEY CONSTRUCTION, INC.;  
TRAFFIC SOLUTIONS, INC.; ADELPHIA  
TELECOMMUNICATIONS CO., INC.;  
SBC TELECOMMUNICATIONS, INC.;  
MOBILE TOOL INTERNATIONAL, INC.,  
dba TELSTA; COUNTY OF  
MENDOCINO; STATE OF CALIFORNIA;  
PACIFIC BELL TELEPHONE COMPANY;  
PACIFIC TELESIS GROUP; SBC  
OPERATIONS, INC.; and DOES 1 to 100

## Defendants

ADELPHIA COMMUNICATIONS  
CORPORATION, aka CENTURY  
MENDOCINO CABLE TV dba ADELPHIA  
CABLE COMMUNICATIONS

### Cross-Complainant.

v

**PAULEY CONSTRUCTION, INC., and  
ROES 1 to 50, INCLUSIVE.**

## Cross-Defendants

Case No.:

**REQUEST FOR JUDICIAL NOTICE IN  
SUPPORT OF MOTION TO TRANSFER  
VENUE PURSUANT TO 28 U.S.C. § 1412  
TO THE UNITED STATES DISTRICT  
COURT, SOUTHERN DISTRICT OF  
NEW YORK BANKRUPTCY COURT**

DATE: July 26, 2007  
TIME: 2:00 p.m.  
COURTROOM: 2  
1301 Clay St., 4<sup>th</sup> Fl.  
Oakland, CA 94612

1           NOW COMES ADELPHIA COMMUNICATIONS CORPORATION, aka Century  
 2 Mendocino Cable TV dba Adelphia Cable Communications (hereinafter "ADELPHIA"), by and  
 3 through its attorneys Ryan & Lifter, and requests this Court take Judicial Notice of the Complaint and  
 4 Summons originally filed by Sifa Tuiaki and Lupe Tuiaki against, *inter alia*, PAULEY  
 5 CONSTRUCTION INC. ("PAULEY") and ADELPHIA, filed on September 5, 2003, San Francisco  
 6 Superior Court case number CGC-03-419761, and attached hereto as Exhibit "A". ADELPHIA also  
 7 requests this Court take Judicial Notice of the Service of Summons upon PAULEY performed  
 8 September 10, 2003, and filed on September 19, 2003, San Francisco Superior Court case number  
 9 CGC-03-419761, and attached hereto as Exhibit "B".

10           Courts may take judicial notice of facts "[g]enerally known within the territorial jurisdiction of  
 11 the trial court, or ...[c]apable of accurate and ready determination by resort to sources whose accuracy  
 12 cannot be reasonably questioned" (F.R.E. 201(b)). The docket entries are readily accessible through  
 13 the ECF/PACER system, and easily verifiable by this Court.

14           WHEREFORE, ADELPHIA requests this Court grant its request to take judicial notice of  
 15 Tuiaki's Summons and Complaint against, *inter alia* PAULEY and TUIAKI, and of the Service of  
 16 Summons upon PAULEY performed September 10, 2003, and filed on September 19, 2003.

17 Date: June 7, 2007

18           RYAN & LIFTER  
 19           A Professional Corporation

20           By /s/ Michael J. Daley  
 21           MICHAEL J. DALEY

22           Attorney for Defendant/Cross-Complainant  
 23           ADELPHIA COMMUNICATIONS  
 24           CORPORATION, aka Century Mendocino Cable  
 25           TV dba Adelphia Cable Communications